



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 25 1993

Jude Hobza
U.S. Army Corps of
Engineers - CEMRO-EO-ER
215 N. 17th Street
Omaha, NE 68102

REPLY TO THE ATTENTION OF:

HSRL-6J

EPA Region 5 Records Ctr.



258606

Dear Mr. Hobza:

U.S. EPA and Illinois EPA have reviewed the "Final" Work Plan for the removal of hard rubber battery case material and have the following comments:

General Comment

Scale back the Work Plan to perform as much work as possible under the current cost restraints, as discussed in our January 19, 1993 telephone conversation.

Specific

1. Change Figure 3.1 to reflect the current schedule. Assume February 22, 1993 as the construction start date.
2. Appendix A, Page 2-2, Section 2.2 - Unless a good correlation between XRF results and lab results can be demonstrated, XRF should not be used extensively for this project.

The Illinois EPA comments are enclosed with this letter. With the exception of the five health and safety comments in the enclosure, all comments must be addressed for approval of the Final Work Plan.

If you have any questions or concerns regarding this letter or the enclosure, please contact me at (312) 886-4742.

Sincerely,

Brad Bradley

Brad Bradley
Remedial Project Manager

enclosure

CC: Brian Kulnan, IEPA
with enclosure

Enclosure

Page 1-4. Section 1.4.3. Please explain why the contamination in the yard will not be a part of this work effort.

In addition, the IEPA has the following comments:

Page 1-2. Last paragraph. This sentence should read: "The cleanup criteria outlined in the ROD March 30, 1990, as defined by the USEPA requires the removal of all visual contamination from alleyways, driveways, etc., backfilled if necessary, and paved,..."

Also the document contains numerous references to the "USEPA's on-site representative to determine the limits of the excavation." Has it been determined "who" and "how" this methodology will be implemented to maintain consistency throughout the project?

Outstanding Health and Safety Plan comments are as follows:

F. Site Control. Site emergency communications have not been adequately addressed.

H. Emergency Response/Contingency Planning. The local Fire Department has apparently not been notified concerning possible site contaminants and site operations.

The maps provided did not clearly show the verified route to St. Elizabeth Medical Center.

Written directions describing the verified route to the Medical Center were not provided.

I. Confined Space Entry. It seems that confined space entry will not be encountered at this site. If so a short statement should be included confirming this fact.